

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

In re:	§	
	§	
GOLDEN OIL COMPANY,	§	CASE NO. 03-36974-H2-11
	§	
Debtor.	§	
	§	

**OBJECTION OF THE UNITED STATES TO DEBTOR'S  
FIRST AMENDED AND RESTATED JOINT DISCLOSURE STATEMENT**

The United States of America, on behalf of its agencies the Bureau of Land Management ("BLM") and Mineral Management Service ("MMS") object to the Debtor's First Amended and Restated Joint Disclosure Statement ("Disclosure Statement") showing as follows:

1. The BIA and MMS have filed timely proofs of claim in this case. (Claims No. # 36, 62, 63 (amends #22).
2. To date, the Debtor has not filed an objection to these proofs of claim. Pursuant to Rule 3001, a proof of claim filed in accordance with the Federal Rules of Bankruptcy Procedure constitutes prima facie evidence of the validity and amount of the claim.
3. The Disclosure Statement provides that the "Debtor indents to object to the claims shown on Exhibit 6.4." Disclosure Statement at ¶ 6.4. Exhibit 6.4 provides that claims listed herein are deemed objected to by the filing of the Disclosure Statement and Plan. Exhibit 6.4 to Disclosure Statement.
4. Debtor's attempt to bury its claim objections in Exhibit 6.4 does not comply with Fed. R. Bankr. P. 3007. Furthermore, inasmuch as an objection to claim is a contested matter governed by Fed. R. Bankr. P. 9014, any objection to a claim must be served in accordance with Fed. R. Bankr. P. 7004. *See: Fed. R. Bankr. P. 3007, Advisory Committee Notes.*

5. The Debtor has used this back door “objection” to justify its failure to treat the claims of BIA and MMS in the plan of reorganization. Such action is impermissible and fails to properly address the substantial claims of the BIA and MMS in the Disclosure Statement.

6. The United States objects to the Debtor impermissible attempt to object to its proofs of claim through an exhibit to the Disclosure Statement and prays that it Disclosure Statement be denied.

Respectfully submitted,

MICHAEL T. SHELBY  
UNITED STATES ATTORNEY

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Certificate of Service

I hereby certify that a true and correct copy of the foregoing Objection of the United State was service on all parties in interest as set forth on the attached Service List on December 17, 2003.

**Judy A. Robbins**  
Judy A. Robbins

SERVICE LIST  
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BKR: 03-36974

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Law Office of Peter Johnson  
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Hector Duran, Trustee  
Office of the U.S. Trustee  
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Houston, Texas 77002

N.M. Taxation/Rev. Dept. Oil & Gas Bureau  
1200 south St. Francis Dr.  
POB 5374  
Santa Fe, NM 87502  
Attn: Mr. Valdean Severson

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Houston, TX 77027

Instrument Specialties Co., Inc.  
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Houston, TX 77027

Ralph T. McElvenny, Jr.  
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Bureau of Land Management of Dept of Interior  
POB 5810 T.A.  
Denver, CO 80217

State of New Mexico  
Oil Conservation Division  
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Aztek, NM 87410

Nortex Corporation  
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Houston, TX 77002

Taurus Expoloration USA  
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Farmington, NM 87401

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